

EXHIBIT C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

In re CASSAVA SCIENCES, INC.
SECURITIES LITIGATION

This Document Relates To:

ALL ACTIONS.

) Misc. Case No. 2:24-mc-51329-MAG-
) DRG

Honorable Mark A. Goldsmith

Originating No. 1:21-cv-00751-DAE
(W.D. Tex.)

CLASS ACTION

DECLARATION OF KEVIN A.
LAVELLE IN SUPPORT OF
PLAINTIFFS' REPLY IN FURTHER
SUPPORT OF MOTION TO COMPEL
THE PRODUCTION OF DOCUMENTS
FROM NON-PARTY DR. HOAU-YAN
WANG

I, Kevin A. Lavelle, declare, under penalty of perjury:

1. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, the State Bar of California, and am lead counsel for lead plaintiff Mohammad Bozorgi. I submit this declaration in support of Plaintiffs' Reply in Further Support of Motion to Compel the Production of Documents from Non-Party Dr. Hoau-Yan Wang.

2. Attached as Exhibit 11 is a true and correct copy of an email chain between counsel for Dr. Wang and myself ranging from November 25, 2024 to November 29, 2024.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on December 9, 2024.

s/ Kevin A. Lavelle

KEVIN A. LAVELLE

EXHIBIT 11

From: [Kevin Lavelle](#)
To: ["Beidel, Jennifer"; Blackwood, Emma K.F.](#)
Cc: [Caprez, Timothy](#)
Subject: RE: WANG fourth Rolling Production
Date: Friday, November 29, 2024 10:13:17 PM
Attachments: [image001.png](#)

Jennifer,

Hope you had a nice Thanksgiving. We appreciate your courtesy. Though we disagree the process violated FRCP 45(c)(2)(A)'s 100-mile rule, I also understand you accepted service of the subpoena, which set the place of compliance in Michigan, where you – Dr. Wang's counsel – are located. Thereafter, Dr. Wang did not object to the place of compliance or move to quash the subpoena on this basis, but rather his attorneys made repeated document productions pursuant to the subpoena.

Given that Dr. Wang did not raise any concern with the place of compliance before, during or after our meet and confers prior to Plaintiffs' motion to compel being filed, Dr. Wang waived any such objection. But we are nevertheless happy to consider any authority you may have suggesting that Plaintiffs should withdraw their motion.

And although we do not view the place of compliance as problematic, especially under these circumstances, we would agree, as a compromise, to Dr. Wang producing the requested documents at a different location. Of course, we do not believe this is necessary, particularly given that the documents will be sent electronically over email, just as you have produced Dr. Wang's documents to us in the past. But, in the interest of addressing the issue without further delay, please let us know if this resolves the matter.

-Kevin

From: Beidel, Jennifer <JBeidel@dykema.com>
Sent: Monday, November 25, 2024 9:55 AM
To: Kevin Lavelle <KLavelle@rgrdlaw.com>; Blackwood, Emma K.F. <EBlackwood@dykema.com>
Cc: Caprez, Timothy <TCaprez@dykema.com>
Subject: RE: WANG fourth Rolling Production

EXTERNAL SENDER

Counsel:

Dr. Wang both resides and works more than 600 miles from Franklin, Michigan. Therefore, your process violates FRCP 45(c)(2)(A)'s 100-mile rule. We are happy to point that out to the Court in our opposition, but wanted to provide you the professional courtesy of notice of that deficiency and the opportunity to withdraw your motion.

Best,
Jennifer